

November 7, 2001

Chairman Michael K. Powell
Federal Communications Commission
445 12th St., S.W.
Washington, D. C. 20554

**Re: ET Docket 98-153: In the Matter of Revision of Part 15 of
the FCC's Rules Regarding Ultra-wideband Transmission
Systems**

Dear Chairman Powell:

As member companies of the ultra-wideband (UWB) industry, we are writing to you to unanimously affirm our strong support for your stated intention to issue rules in the fourth quarter of this year that will enable ultra-wideband technologies to be deployed. As you know, UWB is a wireless technology that has the potential for creating innovative and beneficial new services involving multimedia communications devices, as well as radar and positioning for both the commercial and safety-of-life markets. As active participants in this three-year-old proceeding, we believe that the record is complete and that UWB services can be deployed in a manner that does not create harmful interference to existing services.

The Commission's Notice of Proposed Rulemaking proposals are an example of a conservative proposal that is far more restrictive below 2 GHz than the Part 15 general limits. This shows the FCC has clearly recognized the need to proceed in a cautious manner. The record underscores the fact that the agency can adopt regulations that will foster the development of competing UWB technologies without risking harmful interference.

The ultra-wideband industry is unique in that it consists largely of start-up entrepreneurial companies that are dependent upon the capital markets for their future financing. The continued pendency of this proceeding only exacerbates the extremely difficult economic climate that we face in continuing to develop our products and bring them to market.

Again, our message is simple: Issue a Report and Order in this rulemaking now to allow UWB manufacturers to get their products into the marketplace. The

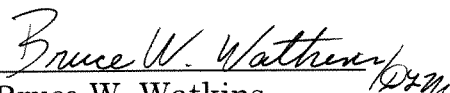
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record is replete with evidence that this can be done without creating harmful interference to existing services. In so doing, the Commission will have again promoted a far-reaching, innovative wireless technology that will result in economic growth, create jobs, facilitate security/safety-of-life efforts of commercial businesses as well as U.S. government users, bring consumers unprecedented ease of use of technology innovations, and thereby catapult the U.S. into a leadership position.

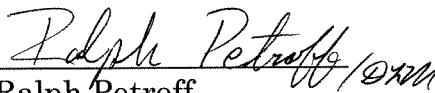
Thank you for your support of our nascent industry.

Very truly yours,

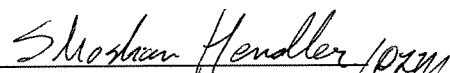
Pulse~LINK, Inc.


Bruce W. Watkins
President and Chief
Operating Officer

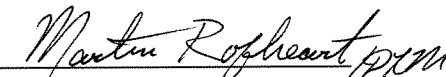
Time Domain Corporation


Ralph Petroff
CEO and President

**Pulsicom Technologies
(Israel), Ltd.**


Shoshan Hendler
Chief Executive Officer

XtremeSpectrum, Inc.


Martin Rofheart, Ph.D
Chief Executive Officer

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cc: Magalie Salas (by electronic filing)
The Honorable Kathleen Abernathy
The Honorable Michael Copps
The Honorable Kevin Martin
Peter Tenhula
Bryan Tramont
Monica Desai
Paul Margie
Bruce Franca
Julius Knapp
Lisa Gaisford
John Reed
Karen Rackley
Ron Chase
Michael Marcus
Robert Pepper
John Williams